

Answers to Interrogatories

Answer 1:

I created the Biles flier named in the complaint based upon the following information. The persons named are chronological in the information I received to develop the flier. I created the flier and it was mailed at my request. I was not hired, directed or coerced to create this document; it was done of my own volition and based upon the facts that follow.

I received a spam website message on my Facebook from someone at email address ending in "@bhbocysm.com" that I opened because it showed a link to the Park county sheriffs department website. Attached was an email conversation between a Tammy Jones, that must work for Biles (and from what sounds like another employee a Collette Schwindt (307-587-2139). There were some risqué photos as well but the web site was taken from the Cody Sheriff link and the email text between these two people discussed Dr Biles telling his staff, and this Jones that he was drunk and he passed out, that he refused the breath test and that the police were assholes and tried to rough him up when he was arrested. Schwindt must have a relative that is a policeman, as the information referred to "JJ" knew all the details of Biles resisting the arresting officer and how drunk he was and kept asking for his lawyer. Jones referred to Biles as a "bear and asshole" and he demanded his employees go into " damage control". Jones also confirmed to Schwindt that Dr Biles former and current employees complained that he frequently drove and drank, coming from clinics and the hospital, picking up his favorite drink, Crown Royal from several of the liquor stores around town. I next had a conversation with Dr Biles employee Sherri Chacon PAC (3078990246) shortly after this happen. I called from my work to the Cody hospital asking for information on Biles and they connected me to her. I represented myself as a concerned former patient's family member and Dr Biles' DUI was confirmed. In the course of our conversation that lasted about 15 minutes, it was obvious she was upset and she hinted Biles was in big trouble "this time" and he was yelling at everyone. She confirmed "Dr Biles was looking for a medical condition that caused him to black out so he could defend himself against this criminal offense."

When I received this information about Dr Biles I spoke with people in the medical area of Cody that I have known over the years, such as CNA Tamarra Pederson (1701 32nd St. Cody Wyoming; 307-527-6888). I believe she works in one of the hospitals and she confirmed that all of the nurses and doctors knew about Biles arrest. One of my grandmothers former physicians and now family friend practicing in the area is Dr Schneider (2877 Overland Ave, Billings Montana, 307-587-0777, 307-899-6410, info@omnispinecenter.com). I spoke once or twice with Dr Schneider who informed me he heard of the Biles DUI and the sheriff's web site from a flier that one anesthesia doctors that Biles helped run out of town made about Biles. Dr Schneider also told me of Dr. Biles drunk car accident before this DUI, in

which a hospital scrub nurse "Destiny", had to pick him up in the middle of the night because he was drunk and left his wrecked car at the side of the road. I subsequently learned from Dr Schneider that Dr Biles has complaints to the Board of Medicine in Wyoming from his former PAC Scott Wilson, who works for Dr Gee in Cody and Harley Morrell PAC that works for Dr Schneider. They reported Biles because he was alcohol impaired while in the operating room and drunk while seeing patients. Dr Schneider told me of his own experience with Biles changing medical records and how Biles was trying to run Dr Steve Emery (semery@btortho.com, 307-5273355) and Dr Schneider out of town, since Biles was not part of their business deal in Billings. Dr Schneider said none of the other orthopedic surgeons liked Biles or would work with him, so he was not invited to be part of their group. Dr Schneider said he would give my attorney a voice recording of Dr Biles calling an anesthesiologist, Sandra Whalen in Cody in which Dr Biles left a long message on her cell phones answering machine where he admits to running Dr Cohen out of town and says he is running Dr Emery out of town as well.

I did ask Dr Schneider why someone was not telling the community about Biles, as he is a danger to both patients as well as the public with his alcohol abuse and his attacking so many other doctors. Dr Schneider said Biles was a bully and people tried to stay away from him, but he did indicate that the sheriffs web site was a public disclosed document and letting people know about it was both ethical and true. Schneider also said that the story of Dr Biles fighting with the police and that he was so drunk he couldn't walk was common knowledge in the hospital and at the surgery center. He said many of the doctors (Dr Frank Schmidt, Dr Steve Emery, Dr Meyer, Dr Tilden, Dr Slight, Dr Divensenso, Dr Hansen, Dr Segar, Dr Morton, and others) talked about it since the hospital now had to deal with the public knowledge that one of the physicians on active medical staff at the hospital was involved in a criminal offense and Biles was considered an "impaired physician" by the credentialing and executive committee. Since I deal with impaired physicians and medical personnel Indiana, we discussed how this is addressed in my hospital.

In the course of our conversation, I asked Dr Schneider how he communicates to patients and prospective patients in the area. He said with direct mailers. I told him I thought everyone should know about Biles and I asked him if I could buy the addresses he uses in his mailers to use at my discretion. Schneider said that they were public files that anyone can use and they did not specifically come from his patient database and were not "his patients" so he had no problem just giving me a labels database from Park County and its surrounding counties. I did not pay for them and Dr Schneider did not ask for any payment, he just mailed them to me on a stick drive. I did not go through it, I just gave that stick drive with the flier I made and the labels to the printer. I told Dr Schneider I was going to send a note to everyone telling them to look at the sheriffs website. He laughed and said "Dr Biles deserves it as he is a menace to the community of doctors and he was probably going to kill someone when he was drunk."

I believe Dr Schneider may have had concerns for my well being, even with knowing the truth about Biles as he told me Biles was very litigious and even sued his own mother years ago. After I had decided to send the flier I created from the sheriffs department web site, Dr Schneider did call me once and I returned his call when I was with the printer. I believe the flier I created needed to be sent, even though Dr Schneider indicated that the truth about Biles would be coming out in a lawsuit he was involved in. I think he spoke with the printer to caution against sending anything, but the printer said he already sent the flier. I next spoke to Dr Schneider about this one time after he received the flier in the mail. He only said " that was creative and I am sure lots of people are looking at the sheriffs website now". He said he did not know of anyone else that said they received the flier.

Answer #2:

Funds were from multiple sources, some of which I borrowed from friends and relatives over time without their specific knowledge of how I use the money. I am a divorced mother of three and I was making ends meet. I felt this cause was significant enough and my past knowledge of Biles was enough to make me furious and the public has a right to know the truth. I chose to use my money and some of these other monies for this cause. I have repaid any money back to people over the last year that requested money payback from any money borrowed, whether to pay the printer or use for other purposes for my family.

Answer#3:

Please see answer #1

Answer #4:

Please see answer number 1. I am very familiar with the medical doctors in Cody as my relatives live in Belfry, MT and Cody is the nearest medical care. Years ago, in the late 90s I think, my now deceased grandmother used Dr Celia Stenforce Dacre for pain management as a rehab doctor. I went to a few appointments. She was wonderful but was run out of town by Dr Biles and I talked to her years ago about this and she was very sad. I have her email address only, cdacre@wyoming.com. My grandmother switched to Dr Jerry Smith, but then Dr Biles ran him out of town as well. I think he sued Biles and won. I don't have his address. I met a Stacia Jensen years ago that was friends with Tamarra Pederson, CNA. Tamarra's kids and mine played sports together. Ms Jensen lives in Cody and at that time, worked for Dr

Biles. I remember Stacia was very upset once when we talked about her job, since I was interested in going into nursing and Tamarra was a CNA. She said her boss, Dr Biles was always drinking when he was driving them home from clinic, always making sexual passes at her and very mean to her. She told a group of us that he would routinely pick up a fifth of whiskey and drink and drive home from clinics, that he was always trying to sleep with her and he would say very nasty things about his wife. This was maybe summer of 2001 or 2002. A few years ago I heard from a lady that saw Dr Gee as a patient, who was friends with my grandmother, I don't recall her name. Someone in Dr Gee's office said "that Dr Biles was at it again saying nasty things about Dr Gee." I do not know Dr Gee. The other story from that office was that Dr Biles had pulled a rifle out and aimed it at radiology worker in their office and no one wanted to work in that building near Dr. Biles.

I created this flier and sent it to the community where Dr Biles works to warn people of a monster and a bully whose alcohol abuse is legendary and who believes he is above the law. He has hurt many professionals and threatens the lives of every person who lives in that community when he drives or shows up to the operating room drunk.

Answer #5:

My conversation with people I know who live in the Cody community includes many people from the newspaper, private citizens, and people who say they are from the hospital all calling me after my name was released by the printer and by the paper. I have not kept any record of all the people I spoke with and all the conversations I have had. Several people who said they were doctors or worked with doctors in Orthopedics in that area said they would be happy to help me pay for any defense to expose Dr Biles. I was told to call any of the following numbers: 307- 578-1959; 307-527-9191; 307- 527-7561; 307- 578-1955; 307-527-7100. I have not called any of these directly. Dr Schneider, who I do know from years ago when he saw my Grandmother for her low back and whose kids went to school with my kids, did call me on my cell phone after I was named in the law suit by Dr Biles and it was published in the paper. He also offered to assist in my defense, including providing information to my attorneys about Dr Biles and his alcohol abuse and all the people who will testify to these facts, including himself from when he was Chairman of Surgery at West Park Hospital in Cody. I have authorized my attorney to speak with any nurse or doctor who works in these hospitals who has any information about Dr Biles past in preparing anything I will need to defend myself in this action. I want Dr Biles exposed.